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 on signature page.*

UNITED STATES DISTRICT COURT
 FOR THE NORTHERN DISTRICT OF CALIFORNIA

DERRICK SATCHELL, KALINI BOYKIN,)
 VALERIE BROWN, RICK GONZALES,)
 CYNTHIA GUERRERO, RACHEL)
 HUTCHINS, TYRONE MERRITT, KELVIN)
 SMITH, SR., and KEN STEVENSON, on behalf)
 of themselves and all others similarly situated,)
 Plaintiffs,)
 v.)
 FEDEX EXPRESS, a Delaware Corporation,)
 Defendant.)

Case Nos. C03-02659 SI; C03-02878 SI

CLASS ACTION

STIPULATION AND [PROPOSED]
 ORDER ALLOWING PLAINTIFFS'
 REPLY IN SUPPORT OF MOTION FOR
 AN ORDER FINDING SNYDER
 DEPOSITION TESTIMONY TO BE
 ADMISSIBLE, AND THE SUPPORTING
 PRESTEL DECLARATION, TO BE FILED
UNDER SEAL

1 WHEREAS on November 21, 2005 the Court ordered that any portion of the depositions
2 of Michael John Snyder taken in *Pettaway-Vint v. Federal Express Corp.* or *Simonian v. Federal*
3 *Express Corp.* that are filed with the Court should be filed under seal;

4 WHEREAS on August 30, 2006 the Court ordered that the deposition of Mr. Snyder
5 taken in this case should also be filed under seal;

6 WHEREAS the reply brief submitted for filing by plaintiffs on January 10, 2007 (titled
7 Plaintiffs' Reply in Support of Motion for an Order Filing Snyder Deposition Testimony to Be
8 Admissible) discusses and quotes from the Snyder depositions that the Court has ordered should
9 only be filed under seal;

10 WHEREAS the supporting Declaration of Claire Prestel submitted for filing on January
11 10, 2007 attaches excerpts from Mr. Snyder's *Simonian* deposition as an exhibit;

12 THEREFORE, the Parties, by and through their counsel, stipulate and request that
13 plaintiffs' reply brief and the supporting Prestel Declaration submitted January 10, 2007 may be
14 filed under seal pursuant to Local Rule 79-5 and this Court's November 21, 2005 and August 30,
15 2006 orders.

16
17 Dated: January 12, 2007

ALTSHULER BERZON LLP

18
19 By: 
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1 DATED: January 12, 2007

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